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Official Committee of Unsecured Creditors

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

	)	Chapter 11
In re:	)	
	)	Case No. 11-47056-ESS
PENINSULA HOSPITAL CENTER, <i>et al.</i> ,	)	
	)	Jointly Administered
Debtors.	)	
	)	

**FIRST SUPPLEMENTAL DECLARATION WITH RESPECT TO  
APPLICATION FOR AN ORDER AUTHORIZING EMPLOYMENT  
AND RETENTION OF ARENT FOX LLP AS ATTORNEYS  
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

I, Robert M. Hirsh, hereby declare under penalty of perjury:

1. I am a partner in the Bankruptcy and Financial Restructuring Group at Arent Fox LLP (“Arent Fox”), a law firm which employs approximately 360 attorneys and maintains an office for the practice of law at 1675 Broadway, New York, NY 10019 as well as offices in Washington, DC, Los Angeles, CA, and St. Louis, MO.

2. I am fully familiar with the facts hereinafter stated, and am authorized to make this supplemental declaration (the “First Supplemental Declaration”) on behalf of Arent Fox. The information contained in this First Supplemental Declaration is of my own personal knowledge, from conversations with Arent Fox partners, associates, or staff, or is derived from my review of the file in this case or other public filings or documents.

3. I submit this First Supplemental Declaration to provide continuing disclosures as required pursuant to Section 1103(a) of Title 11 of the United States Code (the “Bankruptcy Code”) and Bankruptcy Rule 2014(a), regarding Arent Fox’s proposed representation of the Official Committee of Unsecured Creditors (the “Committee”) of Peninsula Hospital Center, *et al.* (“the “Debtors”).

4. This First Supplemental Declaration is submitted as a supplement to the Declaration (the “Hirsh Declaration”), submitted on October 6, 2011, in support of the Application of the Committee to employ and retain Arent Fox as counsel to the Committee *nunc pro tunc* to September 26, 2011 to represent it in the above-captioned Chapter 11 cases.

5. As set forth in the Hirsh Declaration, Arent Fox continues to review and update any connections with the Debtors, creditors, parties-in-interest, and professionals as required under Bankruptcy Rule 2014. Accordingly, I make this First Supplemental Declaration in recognition of my ongoing obligation to disclose all connections to the Debtors and their estates as provided under Bankruptcy Rule 2014.

6. In addition to any disclosures regarding the Debtors’ attorneys, Abrams Fensterman, *et al.* (“Abrams Fensterman”), contained in the Hirsh Declaration, Arent Fox hereby provides the following disclosure regarding Abrams Fensterman.

7. Ron Primus, a paralegal in Arent Fox’s Healthcare Group, was employed as a paralegal by Abrams Fensterman immediately before joining Arent Fox in June, 2011. These cases were not filed at the time Mr. Primus worked at Abrams Fensterman and, to my knowledge, Mr. Primus did not perform any work on these cases while at Abrams Fensterman. Out of an abundance of caution, Arent Fox has created a wall with respect to Mr. Primus, and Mr. Primus has had and will have no involvement with these cases.

8. Arent Fox will continue to research potential connections with respect to its proposed representation of the Committee in these cases, and reserves the right to supplement its disclosures as necessary in order to disclose any connections as appropriate.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of October 2011, at New York, New York.

/s/ Robert M. Hirsh  
Robert M. Hirsh